

Message

---

**From:** Mascarenhas, Brendan [Brendan\_Mascarenhas@americanchemistry.com]  
**Sent:** 3/16/2017 9:41:14 PM  
**To:** Krasnic, Toni [krasnic.toni@epa.gov]; Morris, Jeff [Morris.Jeff@epa.gov]  
**CC:** Walls, Michael [Michael\_Walls@americanchemistry.com]; Brozena, Sarah [Sarah\_Brozena@americanchemistry.com]; Starr, Richard [Richard\_Starr@americanchemistry.com]  
**Subject:** EPA-HQ-OPPT-2016-0163: Comments of the American Chemistry Council on EPA TSCA Section 6 Proposed Regulation of TCE Uses  
**Attachments:** ACC Final Comments TCE\_ADSC 3-16-17.pdf

Hello Toni and Jeff,

The American Chemistry Council appreciates the opportunity to comment on EPA's proposed Regulation of Certain Uses of Trichloroethylene under the Section 6 of the Toxic Substances Control Act (EPA Docket ID: EPA-HQ-OPPT-2016-0163). While ACC member companies are not engaged in the manufacturing or processing of TCE for purposes covered by the proposed rule, these comments outline some of our concerns with the proposal given its precedential nature as EPA's first section 6 risk management decision under TSCA as amended by the Frank R. Lautenberg Chemical Safety for the 21<sup>st</sup> Century Act. As you will see, these comments encourage the Agency to ensure that its proposal:

- Comports with the requirements of TSCA Section 6 and 26, which include a risk management decision consistent with the scope of the prior completed risk assessment and a requirement that all decisions be based on the best available science, among others;
- Includes a cost-benefit analysis that satisfies regulatory guidelines and best practices as highlighted in OMB Circular A-4;
- Considers a comprehensive set of factors to evaluate a number of risk management approaches and options.

If you have any questions on these comments, please do not hesitate to contact me at the information in the signature block below or my colleague Richard Starr (copied here) at (202) 249-6443. Thank you very much for your consideration.

Regards,  
Brendan Mascarenhas

***Brendan Mascarenhas*** | American Chemistry Council  
Director, Regulatory and Technical Affairs  
[Brendan\\_Mascarenhas@americanchemistry.com](mailto:Brendan_Mascarenhas@americanchemistry.com)  
700 2<sup>nd</sup> Street NE | Washington, D.C. | 20002  
O: (202) 249-6423  
[www.americanchemistry.com](http://www.americanchemistry.com)

+++++ This message may contain confidential information and is intended only for the individual named. If you are not the named addressee do not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message which arise as a result of email transmission. American Chemistry Council, 700 – 2nd Street NE, Washington, DC 20002, [www.americanchemistry.com](http://www.americanchemistry.com)